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[additional counsel on signature page]

Lead Counsel for Lead Plaintiffs and the proposed Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE AKARI THERAPEUTICS PLC
SECURITIES LITIGATION

17 Civ. 3577 (KPF)

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that on November 28, 2018 at 2:00 p.m. in Courtroom 618 of the Thurgood Marshall Courthouse, United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, or as soon thereafter as the parties can be heard, Lead Plaintiffs will and hereby do move the Court, the Honorable Katherine Polk Failla for final approval of the proposed class action.

This motion is based upon this notice of motion and motion, the accompanying memorandum of law, the accompanying Declaration of Phillip Kim In Support of Lead Plaintiffs' Motions For: (1) Final Approval of Proposed Class Action Settlement; and (2) Award of Counsel Fees, Reimbursement of Expenses, and Award to Lead Plaintiffs, the exhibits attached thereto,

and such argument and additional papers as may be submitted to the Court before and at the hearing on this motion.

Dated: October 31, 2018

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

By: /s/ Phillip Kim
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Additional Counsel for Lead Plaintiffs and the proposed class

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2018, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim